

MEMO ENDORSED

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC#:  
DATE FILED: 12/2/19

## Tilton Beldner LLP

www.tiltonbeldner.com

626 RXR Plaza  
Uniondale, NY 11556  
Direct Tel.: (516) 262-3602  
Fax: (516) 324-3170  
jbeldner@tiltonbeldner.com

November 27, 2019

Via ECF

Hon. Judge Andrew L. Carter  
U.S. District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: Jacqueline Gray v. Mid-Bronx CCRP Early Childhood Center, Inc. et al  
Index No. 18-CV-7934 (ALC) (OTW)

Dear Hon. Judge Carter:

This office is co-counsel in our representation of Defendants in the above referenced matter, and I write to respectfully request an extension of the deadline to submit a settlement agreement and motion for court approval pursuant to *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199 (2d Cir. 2015). Counsel for the parties are in the process of finalizing a written settlement agreement, but anticipate difficulty obtaining all of the necessary signatures by the current deadline of December 1, 2019. We respectfully request an extension until December 14, 2019. I have conferred with counsel for Plaintiff, and he consents to this request. This is the first request for an extension of the deadline. Should the court grant the parties' request, no other future deadlines would be affected.

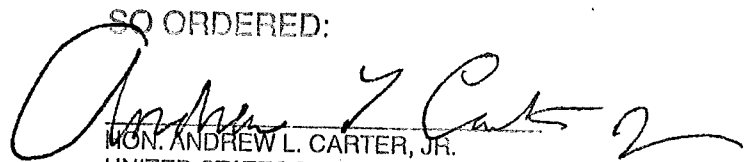
Thank you for your time and consideration regarding this matter.

Very truly yours,

/s/  
Joshua Beldner

CC: VIA ECF  
*Counsel for all parties*

SO ORDERED:

  
HON. ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE

12/2/19